

1           Q           The fact that three of those are designated  
2 as used would that indicate that the rest were new?

3           A           No, no. Oh, ... okay, I'm sorry.

4           Q           The others are not so indicated. I'm trying  
5 to clarify that. That would mean those three items you're propos-  
6 ing used equipment, is that correct?

7           A           I'm pretty sure those were and some of the  
8 others, just depending because there's really good used equipment  
9 out there, so, you know, there could be some other that could be  
10 used, depending on what I could find when I was ready to make the  
11 purchase.

12          Q           Okay, right. To distinguish, at the time you  
13 were ready to construct the station you might acquire used equip-  
14 ment, all used equipment if you so desired, is that correct? I'm  
15 just asking.

16          A           Okay, depending ... yeah.

17          Q           At that point in time I'm just asking in pre-  
18 paring this....

19          A           Some was used, some was new. A majority was  
20 new, yes.

21          Q           I'm just asking whether or not if on your  
22 list you've designated something as used if the remaining items  
23 that you estimated as a new cost as opposed to used cost?

24          A           Yes. Basically, yes.

25          Q           I guess another way to ask that question are

1 there any items on that list that you estimated a used cost that  
2 you didn't designate as a used cost?

3 A No, I don't think so.

4 Q The three items that you proposed were used  
5 did you contact or get a quote from anyone on those, any equip-  
6 ment supplier or manufacturer for those three items. They are the  
7 only ones I'm asking about.

8 A Yes.

9 Q You did? Did you get any written....

10 A No.

11 Q Were those in writing?

12 A No.

13 Q Do you recall who you obtained those esti-  
14 mates from? Just those three items.

15 A I think most of the used or part of the used  
16 was Hall Electronics out of Virginia. They also said they had  
17 access to other equipment, you know, when needed.

18 Q You didn't enter into any kind of agreement  
19 or anything with them regarding purchasing any equipment from  
20 them, is that correct?

21 A No.

22 Q Did you have any assistance from anyone else  
23 -- I realize you contacted equipment suppliers and I'm not ask-  
24 ing that -- I'm asking did you have any assistance from anyone  
25 else, other than Mr. Hayes, in preparing your cost estimates?

1                   A           No. He possibly did, but I did not.

2                   Q           Okay, that's fine. I think I have one more  
3 question about that. I'd like to show you with reference to that  
4 a portion of your application. This is Exhibit #E-2, an antenna  
5 sketch. Do you see that Exhibit #E-2 of your application? On your  
6 equipment estimates you list, when you refer to your antenna  
7 system, you refer to a six-bay antenna and the antenna sketch  
8 appears to reflect a two-bay antenna. I'm curious as to which  
9 type of antenna system you're proposing. Do you know?

10                  A           Not really. Owl Engineering did that and I  
11 didn't consult as far as what they put on there.

12                  Q           So you didn't discuss with Owl whether it  
13 would be a two-bay or....

14                  A           No, I don't think so. I don't even remember  
15 what was said.

16                  Q           Are you proposing, then, a six-bay antenna?

17                  A           Whichever...I'm not an engineer, so I would  
18 say whatever is the best I could do at that point in time.

19                  Q           Did the six-bay antenna, was that an idea  
20 that originated with Mr. Hayes then?

21                  A           Yes, yes. He had built an FM station and he  
22 had some recommendations on several areas.

23                  Q           So that would explain that. I want to ask  
24 just a couple of questions about page one of that exhibit, Ex-  
25 hibit #1, on the operating costs. For your first month of ex-

1 operation?

2 A Yes.

3 Q I note that you indicated at the bottom of  
4 page one your total...the expenses that are reflected on your  
5 Exhibit #1, the total comes to \$136,482.88?

6 A Right.

7 Q And the total estimate, cost estimate you  
8 reported in your application as we've already established, in  
9 response to Section 3, was \$175,00?

10 A Correct.

11 Q Is there any other equipment or operating  
12 cost that you have identified that you intend to meet out of that  
13 difference basically, the difference? We've got a \$38,000 dif-  
14 ference.

15 A As a matter of fact, this estimate probably  
16 is high because some of the proposals I got -- this was several  
17 years ago -- Some of the proposals are even less than on this  
18 sheet.

19 Q Well, I guess what I'm saying is, you have  
20 between what you've reported in your application as being your  
21 total cost, one hundred seventy-five....

22 A Right.

23 Q ...and what you've got on your sheet, and I'm  
24 simply asking is there other equipment that you are intending to  
25 purchase that you didn't list or are there other operating ex-

1 have some surplus equipment that I didn't list because I already  
2 have it.

3 Q Okay. The one hundred seventy-five figure  
4 that you listed in your application that we've mentioned is  
5 greater than the amount of the total estimate that you show on  
6 your Exhibit #1, deposition Exhibit #1. Did you include any cost  
7 of prosecuting the application in your estimate in Exhibit #1?  
8 When I say "prosecuting the application" what I mean is to pay  
9 engineering, attorney's fees for the prosecution of the appli-  
10 cation.

11 A Yes, there's some in the surplus for that,  
12 yes.

13 Q Okay. Now, moving on to Item 3 of Section 3  
14 of your application, it asks you to identify the sources of funds  
15 you intend to use to meet your estimated costs, and you've iden-  
16 tified Stan Puckett, President of the Greene County Bank, who you  
17 identify as being your banker, and indicated an amount of  
18 \$175,000, is that correct?

19 A Correct, yes, uh-huh.

20 Q Now, would those funds be provided in the  
21 form of a loan?

22 A Yes.

23 Q I presume the loan would be from the bank,  
24 not from Mr. Puckett?

25 A Right.

1 Q Let me show you another document.  
2 MR. BRADY: Will you mark this for me, please? (EXHIBIT  
3 #2)  
4 Q Mr. Bryan, let me show you a copy of what's  
5 been marked as your deposition Exhibit #2.  
6 A Okay.  
7 Q Do you recognize that document?  
8 A I do.  
9 Q Is that a letter out of Greene County Bank?  
10 A That's correct.  
11 Q What's the date, since you're looking at it?  
12 A December 12, 1991.  
13 Q It's signed by Stan Puckett as president, is  
14 that correct?  
15 A That's correct.  
16 Q Now, was the purpose of that letter to docu-  
17 ment the availability of a \$175,000 loan from Greene County Bank?  
18 A Yes.  
19 Q And for the purpose of constructing and oper-  
20 ating this station, is that correct?  
21 A Correct.  
22 Q Or the one you're proposing to build?  
23 A Right.  
24 Q As part of filing your application, did you  
25 obtain any other documentation of that loan or any other docu-

1 ments relating to that loan?

2 A No.

3 Q Could you tell me, how did you go about ob-  
4 taining the loan commitment and that letter from the bank, the  
5 steps you went through basically?

6 A Okay. I do a lot of banking at Greene County  
7 Bank and have a good relationship with them and basically I asked  
8 Mr. Puckett, told him what I would be doing and if the bank would  
9 be interested in handling the loan and he said yes, and he said,  
10 "Tell me what you need." Then I went back and, you know, came  
11 up with a figure that I needed and they went before the loan com-  
12 mittee.

13 Q You said when you went back to meet with  
14 them, did you at that time provide him...you said you provided  
15 him with a figure. I presume that was \$175,000?

16 A Right, right.

17 Q Did you provide him with any written budget  
18 for this station?

19 A Not really, no.

20 Q Did you provide him a copy of your deposi-  
21 tion Exhibit #1?

22 A No.

23 Q And you didn't provide him anything in writ-  
24 ing like that?

25 A They had a financial statement at the bank

1 Q And a pledge of the stock of the company?  
2 A Yes.  
3 Q Did anyone else guarantee that loan....  
4 A No, sir.  
5 Q ...other than perhaps your wife? I don't know  
6 whether your wife was required, but I wasn't really referring....  
7 A I think she had to sign everything.  
8 Q I thought she might. Anyone else other than  
9 your wife?  
10 A No, no.  
11 Q I thought that was a likely possibility.  
12 MR. BRADY: I'd like to have another document marked,  
13 please. (EXHIBIT #3)  
14 Q Mr. Bryan, this was marked as Deposition  
15 Exhibit #3. That appears to be a letter on the letterhead of  
16 Greene County Bank dated September... I can't read from here.  
17 A September 9.  
18 Q 1993?  
19 A Correct.  
20 Q And is that signed by Mr. Puckett as presi-  
21 dent of the bank?  
22 A It is.  
23 Q And it's addressed to you, right?  
24 A Right.  
25 Q Obviously it appears that you recognize it?



1                   A            Yes.

2                   Q            Was that letter, the September 9, 1993

3 letter, was that prepared at your request by Mr. Puckett?

4                   A            I think it was with a discussion, with my

5 attorney that it would be good just to clarify that the money

6 was still available from the bank.

7                   Q            And when you say your attorney, was that Mr.

8 Carr?

9                   A            Mr. Hayes.

10                  Q            Mr. Hayes? Okay.

11                  A            Maybe Mr. Carr. Maybe they both consulted

12 at that point in time. I don't even remember.

13                  Q            Okay, that's fine. The question I have,

14 though, in terms of Mr. Puckett...I assume someone had to call

15 Mr. Puckett and ask him to write another letter, is that correct?

16                  A            Yes.

17                  Q            Or went by to see him?

18                  A            Yeah, I went by to see him, yes.

19                  Q            You were the one who actually communicated

20 with Mr. Puckett, is that right?

21                  A            Correct.

22                  Q            And the purpose of the letter was, you say,

23 to reconfirm the loan was still available?

24                  A            Right.

25                  Q            In the second paragraph...if I may take just

1 a second take a look. In the second paragraph, Mr. Puckett indi-  
2 cates in his letter that a stock pledge would be required in the  
3 event you elected to incorporate your application at some point.

4 A Right.

5 Q But if you intended to own and operate the  
6 station as an individual that a stock pledge would not be re-  
7 quired, is that correct?

8 A Correct, um-hmmm.

9 Q Was that language included at your request?  
10 Did he address that at your request or include that language at  
11 your request?

12 A Yes.

13 Q Can you tell me why you asked him to include  
14 that language?

15 A Our initial conversation with Mr. Puckett...  
16 our initial conversation started way back, I guess, in 1990, I  
17 guess. At that point in time I did not know if we would be a cor-  
18 poration, you know, how it would be set up, and so when we got  
19 the initial bank letter it mentioned about stock and all that and  
20 so basically just to clarify that I was applying as an individual  
21 applicant there would not be any questions about that.

22 Q So you....

23 A It was basically to clarify the previous  
24 letter.

25 Q When you talked with Mr. Puckett and told him

1 you wanted him to write a letter reconfirming the availability  
2 of the loan, and you wanted him to address this question, did you  
3 indicate to Mr. Puckett that you wanted him to clarify that it  
4 would not be required? Is that what you asked him to do, that  
5 there would be no requirement?

6 MR. CARR: For pledge of stock?

7 MR. BRADY: Let me withdraw the question and see if I  
8 can get it right.

9 Q If you recall, what did you say to Mr.  
10 Puckett about that?

11 A Basically that at that point in time I was  
12 probably not going to form a corporation and, therefore, we want  
13 to clarify that if I did not it would be set up that way. Basi-  
14 cally whether it was a corporation or not.

15 Q Okay. Are the interest rates the same on the  
16 two letters?

17 A I believe so. Yes.

18 Q I was just checking.

19 A I tried to get a better interest rate.

20 Q Did you have any discussions with Mr. Puckett  
21 either with reference to the first letter or the second letter  
22 regarding whether or not the funds that the bank was going to  
23 loan could be used to pay prosecution cost? Again, when I say  
24 prosecution cost I mean the attorney fees and engineering fees  
25 that you incur in this process.

1                   A           Yes.

2                   Q           Is that something affiliated with the Chamber

3 of Commerce?

4                   A           It was started through a program of the

5 chamber, yes.

6                   Q           Okay. Do you have any documents, you know,

7 which can be any kind of document, I guess, that would substan-

8 tiate the fact that you held the position as chairman of that

9 committee?

10                  A           I received a certificate. There's probably

11 minutes from many, many chamber meetings.

12                  Q           You don't have copies of them?

13                  A           No, I wouldn't ever get those.

14                  Q           So what you would have would be a certificate

15 then?

16                  A           Right.

17                  Q           You didn't have....

18                  A           When you volunteer there's not a lot of

19 things you get.

20                  Q           Going to page 5, in the second paragraph you

21 mentioned being on the board of directors for the Chamber of Com-

22 merce. It's Greene County?

23                  A           Right.

24                  Q           Is that Greene County Chamber?

25                  A           Greeneville/Greene County. That's the

1 official title.

2 Q Do you have any documents that would sub-  
3 stantiate the fact you held that position as a member of the  
4 board of directors?

5 A After three years on the board, when a person  
6 goes off they only get a certificate of appreciation plaque,  
7 which I've got several plaques. My name is in all kinds of  
8 minutes. I was on a lot of committees.

9 Q The next paragraph refers to you being the  
10 president of the chamber. Were you compensated in that position  
11 or was that....

12 A No, volunteer.

13 Q Totally volunteer. Okay. And you also mention  
14 in that same paragraph being the public affairs vice president.

15 A Right.

16 Q And you indicate that you were responsible  
17 for initiating meetings.

18 A Right.

19 Q Do you recall how many meetings you're refer-  
20 ring to between '88 and '89?

21 A Between '88 and '89 while I was president?

22 Q Oh, I'm sorry.

23 A While I was president, a lot.

24 Q You've corrected me. What I'm asking about  
25 is this public affairs vice president. It says you were respon-

1       sible for initiating meetings. The second part of that paragraph  
2       is the date I had wrong. It's '89 through '90.

3               A               We probably...as chamber president I spent  
4       probably three or four or five hours a week, not counting meet-  
5       ings, and when I was vice president of public affairs I probably  
6       had, I would say, a total of four meetings, one with area legis-  
7       lators. I was the moderator. You know, we were responsible for  
8       putting the entire meeting together, probably spent in the year  
9       probably 20 or 30 hours at least working on that project.

10              Q              What you're just referring to, are those the  
11       meetings that you're referring to, where it says "initiated meet-  
12       ings"?

13              A              Yeah,

14              Q              That's what I was asking about.

15              A              Yes, only those meetings. When I was presi-  
16       dent I spent a whole lot more time.

17              Q              Do you have any documents like you mentioned  
18       before, certificates or plaques or minutes or any other kind of  
19       documents that would substantiate the fact that you held the po-  
20       sition of president of Greene County?

21              A              I've got a plaque. I was glad to get it and  
22       get out.

23              Q              And what about when you were vice president  
24       for public affairs, is there any kind of ....

25              A              They normally awarded a certificate at the

1 annual banquet. I'm not sure if I got one. Again, you go through  
2 the chamber program and it always has all the officers listed and  
3 vice presidents listed.

4 Q Did you keep anything like a scrap book or  
5 resume file that you kept with newspaper clippings and things?

6 A Yeah, I think so.

7 Q Did the chamber ever publish, like a listing  
8 of the members of the board or anything of that sort?

9 A Yes. Oh, yes, yes.

10 Q Would you have something like that, copies  
11 of that?

12 A I'm sure the chamber would.

13 Q But you don't personally have that, is that  
14 what you're telling me?

15 A I'm not positive of what I've kept. I have  
16 so much of that that I probably disposed of it. I think I have  
17 the year I was president, you know, did all that work. I think  
18 I had some information.

19 Q And with respect to public affairs vice pres-  
20 ident would that be the same answer?

21 A Yes, whatever. Again, it's listed in the ...  
22 you know, they had an annual program they put out and they had  
23 projects, all that, that would come out at the annual meeting,  
24 and then at the next annual meeting then they would talk about  
25 what each committee had done and the time spent and whatever.

1 Q Let's see, the last paragraph on page 5 you  
2 refer to being chairman of the retail recruitment committee.

3 A Right.

4 Q In that position did you actually personally  
5 recruit businesses, or were you part of formulating a plan? It  
6 refers to that and I was just....

7 A Kind of a combination, but basically, offic-  
8 ially we could really go out, go to other towns, but we were set-  
9 ting up a committee and trying to find out what we needed to do  
10 to recruit new retailers, what problems our current retailers  
11 had. Again, there was quite a bit of time spent on that. We were  
12 losing some retailers because of Wal-Mart, so we were trying to  
13 find a way to bring new people in.

14 Q That's fairly common.

15 A Yes.

16 Q So your primary function in that aspect of  
17 the chamber was to formulate a plan. Was a plan formulated?

18 A We had various meetings with the retailers,  
19 you know, listening to their problems and trying to help have a  
20 better environment for retail.

21 Q Would you have received a certificate or have  
22 any documents substantiating the fact that you held that position  
23 of chairman of recruitment?

24 A It would be on the minutes. I don't know if  
25 we kept... some of those committees like that we didn't really



1 keep that many minutes, but on the other hand they would report  
2 at various chamber meetings what certain committees did.

3 Q The chamber didn't publish a listing of the  
4 different committees and the members?

5 A Of the committee, yeah. Of the committee they  
6 did, sure. There would be all that.

7 Q Now the Greene County FallFest, it doesn't  
8 indicate specifically, but it says it netted \$50,000 for Chamber  
9 of Commerce projects. Was that a Chamber of Commerce activity?

10 A Yes. Greeneville is a very historical town.  
11 It was really set up to bring people in. You were mentioning  
12 Jonesborough. That's the same type of thing. There were several  
13 days of bringing in tourists and generating interest in historic  
14 Greeneville.

15 Q Did the radio station participate in the  
16 Greene County FallFest?

17 A Did the radio station?

18 Q WSMG is what I'm referring.

19 A It broadcast, yes.

20 Q How does it participate? You said it broad-  
21 cast.

22 A Well, number one, we do a lot of public ser-  
23 vice announcements promoting the event and the two days of the  
24 event the station is on location broadcasting from there. All  
25 three radio stations in town. The other two stations in town all

1 broadcast there for that event. We worked together to make sure  
2 it got promoted really well.

3 Q With respect to the Chamber of Commerce, are  
4 you currently a member of the Chamber of Commerce?

5 A Yes.

6 Q Are you personally a member or is it the  
7 station? Is it WSMG or Burley Broadcasting?

8 A At the time WSMG, I think, is the member.

9 Q Do you currently hold any position with the  
10 chamber, I mean an office?

11 A As of 1993 I think my term expired. Again as  
12 of December 31, '93 my term expired.

13 Q On?

14 A The chamber board.

15 Q Now, what about with respect to your activi-  
16 ties and position as chairman of the Greene County FallFest and  
17 activities with the FallFest, do you have any documents, cer-  
18 tificates or newspaper clippings or whatever, programs or what-  
19 ever, that would substantiate your position, being position of  
20 chairman....

21 A Sure.

22 Q ...as well as activities you might have been  
23 involved in? And I'm talking about you now, not what the radio  
24 station would have done.

25 A Yeah. That was totally separate anyway, but

1 I've been chairman since '85 and there's been newspaper articles  
2 annually that basically...meetings where I was presiding. You  
3 know, some years they try to get them to talk to other people be-  
4 sides myself, you know.

5 Q Does the station, the radio station, does it  
6 sell advertising in conjunction with the FallFest?

7 A Yes.

8 Q So it does sell advertising as a part of that  
9 on location?

10 A Yeah, all three stations do that, yeah.

11 Q Does it do on location...is it doing during  
12 FallFest on location in conjunction with particular businesses?

13 A Yes.

14 Q On page 6 you mentioned being chairman of the  
15 Greene County March of Dimes.

16 A Yes.

17 Q It indicates an amount of \$50,000. Are you  
18 saying here that you raised \$50,000 or that the activities you  
19 were involved in raised it?

20 A The year I was chairman they raised over  
21 \$50,000.

22 Q The efforts of all?

23 A The efforts of everyone together. The year  
24 before I took that it had about almost fallen apart and had not  
25 done well.

1           Q           I was just trying to clarify that. Do you  
2 have any documents substantiating your involvement in that?

3           A           I'm sure I do. That's been a long time. Yeah,  
4 I know I have a certificate. I'm sure I do, or someone does.

5           Q           The next item you list refers to the board  
6 of the Vocational Technical High School. Do you see that?

7           A           Yes.

8           Q           Are you a member of that member?

9           A           No longer.

10          Q           Excuse me, were you a member of the board at  
11 that time?

12          A           Yes, I was a member of the board.

13          Q           It said association and it wasn't clear to  
14 me whether you were actually....

15          A           It was actually an advisory council. The vo-  
16 cational school at that particular time was having a lot of prob-  
17 lems and so we were called in and spent a lot of time trying to  
18 ...there was a possibility of even losing the vocational school  
19 here in Greene County.

20          Q           Was the board you're referring to, does the  
21 vocational technical school have a board?

22          A           Not per se. An advisory council board.

23          Q           Is it a public institution?

24          A           Yes. Yes, they work for the school board, but  
25 the advisory council was set up as a volunteer organization to

1 help with problems and needs of the vocational school.

2 Q So the advisory council would be business  
3 people in the community?

4 A Yes, business people.

5 Q Do you have any documents to substantiate  
6 your involvement in that advisory board?

7 A Yes.

8 Q The next item you list has to do with ...  
9 well, first off the finance committee for First Baptist Church.

10 A Yes.

11 Q How often did that committee meet during the  
12 time you were involved from '86 to '89 on an annual basis, or  
13 whatever?

14 A It met monthly. When it came to budget time  
15 it met for... several days at a time you'd pitch a tent. About  
16 once a year there would be an additional, probably almost several  
17 days long of meetings, at budget time.

18 Q And that was consistent throughout that  
19 period of time?

20 A Yes, yes.

21 Q You also mentioned another committee, the  
22 long range planning committee. What about that? What was the  
23 nature of its meetings? How did it meet?

24 A It met initially weekly for several hours a  
25 week and, gosh, for probably six or eight months and then we'd

1 have bi-weekly meetings and then we had some other meetings. So,  
2 again, a lot of lengthy meetings.

3 Q It says '87 through '88. Was that two years  
4 or ....

5 A It was probably...it was longer than a year.  
6 It was probably a year and a half. Thank goodness that was a com-  
7 mittee that actually disbanded once it reached its goal. We need  
8 more of those.

9 Q With respect to those two committees at First  
10 Baptist Church, would you have any documents to substantiate your  
11 involvement with either of those?

12 A The church would.

13 Q You wouldn't?

14 A You don't get certificates of appreciation  
15 for those, but the church would have documentation, yes.

16 Q The next item carries over to seven as to the  
17 board of directors for the Greene County YMCA.

18 A Correct.

19 Q How often did that board meet?

20 A They had a monthly meeting, plus several sub-  
21 committees that would meet occasionally.

22 Q What did you do with respect to membership  
23 drives?

24 A Call on businesses, contacted people about  
25 becoming a member of the Y, did promotion through the radio

1 station, encouraging Y membership.

2 Q Were the membership drives some kind of an  
3 annual procedure?

4 A Yes.

5 Q Did you participate in each of the years that  
6 you have listed that you were a member of the board?

7 A Yes.

8 Q Do you have any documents to substantiate  
9 your involvement in that?

10 A I do.

11 Q The next one is your board of directors of  
12 Junior Achievement.

13 A Yes.

14 Q How many times did that board meet?

15 A Four times a year, quarterly. Probably a  
16 couple of hours at a time.

17 Q And the Tusculum College Pioneer Club, did  
18 that organization have meetings?

19 A Yes.

20 Q How many meetings did you attend during that  
21 period of time?

22 A This particular year or ....

23 Q It says '90 through '91.

24 A I'm still currently on that. They basically  
25 met in the spring when they would have a drive, probably, oh, I'd

1 say maybe six or eight meetings.

2 Q I don't know if I asked you about Junior  
3 Achievement. Do you have plaques on Junior Achievement?

4 A I have plaques, yes.

5 Q What about the Pioneer Club?

6 A Yes.

7 Q And then the last item on page seven is re-  
8 garding the civic activities. Well, there are two items there.  
9 In terms of Little League, do you have any documents that would  
10 ....

11 A Yes, I do.

12 Q ... substantiate that? I guess I should  
13 finish the question.

14 A I'm sorry.

15 Q That's okay. What about the Jaycees, Greene  
16 County Jaycees?

17 A Yes.

18 Q It doesn't indicate that you held with the  
19 Jaycees any kind of office.

20 A I tried not to.

21 Q Okay. Moving on down to the next section re-  
22 garding broadcast experience, on page seven you list two stations  
23 that you worked at as an announcer: WEZK in Knoxville and WSKT.

24 A Right.

25 A Do you have any old business cards or other



1 documents that would indicate the positions you held at those  
2 stations?

3 A No, I was just beginning, out of school. I  
4 couldn't afford a business card.

5 Q Had to buy your own, huh?

6 A Right.

7 Q Next page, page eight, WSBM in Jefferson  
8 City?

9 A Yes.

10 Q You were the manager there. Do you have any  
11 documents, business cards, newspaper clippings, any other kind  
12 of documents that substantiate the fact you were general manager?

13 A Yes, probably have a newspaper clipping some-  
14 where. I'm not sure what other documents. That's been quite a  
15 while, but I'm sure I do somewhere. I know I have some pictures,  
16 I think.

17 Q What about WAZI in Morristown?

18 A Yeah, I'm sure.

19 Q There you were the operations manager?

20 A Right.

21 Q And you think you would have some documents  
22 relating to that, substantiating that you were....

23 A Yes. One or two of the people that were there  
24 are still there. So there are people around that I worked for or  
25 worked with, yes.